



SECIA
(see-key-ah)

**1170 15th Ave SE
Minneapolis, MN
55414**

**www.secomo.org
comogreenvillage.info
secomo@secomo.org**

612-676-1731



*The Southeast Como
Improvement Association
works to maintain and
enhance the physical, social,
and economic environment of
our neighborhood.*

June 11, 2014

Mr. Hans Neve
Minnesota Pollution Control Agency
520 Lafayette Road
St. Paul, Minnesota 55155

The Southeast Como Improvement Association (SECIA) requests that the Minnesota Pollution Control Agency (MPCA) take the required steps to implement an Emergency Removal Action at the former General Mills Inc. (GMI) research facility located at 2010 East Hennepin Avenue.

Traditional remediation plans tend to focus on the purely technical aspects, yet there are many other levels of harm done to individuals and a community. If the intent is truly to repair the harm, then this project must include actions that address: mental health, physical health, financial health, livability (in homes and in the community) and the long-term viability of the neighborhood. ***In the medical world this multi-faceted approach is often referred to as 360-degree services.*** We strongly feel that to become a model for 'doing this right' for future communities, remediation must include activities that address these human elements along with the technical options measured by industry standards.

We understand that there may be other dump locations, that the actual amount dumped may be under debate and that time may have removed remaining chemicals from the soil. As such we have every expectation that further expanded testing will occur to more clearly define the scope of the problem around the original dump sites as well as the rest of the community. We believe that excavation and testing can be conducted simultaneously.

However, the original dump site has been publically indicated on the map for over 30 years as a site where an incredibly large amount of toxic chemicals were dumped. It is that message that is firmly established in the minds of the Como residents, the media and the general public. Given that easily accessible on-line research and recent media stories do not indicate that any excavation of the site has occurred, the conclusion for the average person is that the site was never excavated and the assumption will be that there are still toxic chemicals located in the soil. Even if soil tests (borings or other sampling methods) show a low degree of TCE, the general public's perception will remain that nothing was done to clean-up the original dump site so prominently starred on all maps. This will continue to raise questions in the minds of current residents and could deter future residents from moving into Como.

Therefore we make this Removal Action request based on the following:

- That it is critically important the community, the public and the media visually see that the original site has been fully excavated as an initial step in the fuller remediation to come.
- That this will help the Como community see that there will be real, physical actions this time in cleaning up the pollution which will show the aggressiveness of short and long-term activities.
- That while this may not be fully in line with typical technical standards, it will start to address concerns related to the comfort of residents as well as the long-term viability of the neighborhood – as it will 'take the star off the map.'

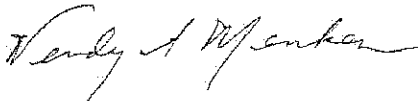
- That any excavation of the original dump site was minimal, as it was determined originally to focus on the pump and treat system of remediation.
- That any chemicals dumped by GMI still reside (or are perceived to be residing) in the soil around the original dumping pit and the average person will assume they still pose a threat for continued contamination of the groundwater.
- That there is little trust in the Como community given past practices and that the original parties – GMI, MPCA – are still the ones that will move this project forward; therefore we need actions that are designed to rebuild trust in the process.
- That the MPCA has the authority to do what is right and could exercise that authority to start visible activities as quickly as possible.
- That the federal Environmental Protection Agency (EPA) recognizes the need for Removal Actions even at sites that will also need longer-term clean-up:

"In addition, abandoned industrial facilities that used chemicals and other hazardous substances may not have stored or disposed of them properly prior to closing operations. Today, these sites are undergoing long-term cleanup actions which may take several years to fully study the problem, develop the right remedy, and clean up the hazardous waste."

"EPA does not ignore the possibility that serious immediate threats to the environment or to the people who live or work around these sites may need to be taken care of before the long-term action is complete, or even underway. If there are any immediate threats present at these sites, EPA may respond quickly to perform a removal action."

"A long-term clean-up site may ultimately have several removal actions, or it may have none. In some cases, removal actions eliminate the need for a long-term cleanup at certain portions of the site. As a result, removal actions may speed the cleanup of portions of the site and may lead to early elimination of the site from EPA's long-term clean-up program." (Source: <http://www.epa.gov/superfund/programs/er/hazsubs/timecrit.htm>)

SECIA believes that direct involvement by the community in the development of a 360-degree approach towards the remediation of the TCE issue should become the model for the MPCA and other communities in the future. We look forward to your consideration and timely response to our request.



Sincerely,
Wendy Menken, SECIA, President

CC: Lee Anderson, General Mills
Mary Sands, Barr Engineering
Rita Messing, Minnesota Department of Health
Cam Gordon, Minneapolis Council Member Ward 2
Kevin Reich, Minneapolis Council Member Ward 1
Peter McLaughlin, Hennepin County Commissioner District 4
Kari Dziedzic, Minnesota State Senator District 60
Diane Loeffler, Minnesota House of Representatives District 60A
Phyllis Kahn, Minnesota House of Representatives District 60B
Keith Ellison, US House of Representatives, Minnesota District 5
Amy Klobucher, US Senator from Minnesota
Al Franken, US Senator from Minnesota